27

28

1	Daniel J. Becka, Esq. (<i>Pro Hac Vice</i>) Law Offices of Daniel J. Becka
2	30 N. LaSalle Street, Suite 2727
3	Chicago, IL 60602 T: (312) 646-1092
4	F: (312) 278-2455 E: dan@dbeckalaw.com
4	E. dandockataw.com
5	Justin C. Kanter, Esq. (Pro Hac Vice)
	Gaido & Fintzen
6	30 N. LaSalle Street, Suite 2727
7	Chicago, IL 60602 T: (312) 346-7855
<i>'</i>	F: (312) 346-8317
8	E: jkanter@gaido-fintzen.com
9	Nicole E. Lovelock, Esq. (NV Bar No. 11187) Kimberley A. Hyson, Esq. (NV Bar No. 11611)
10	Andrea Champion (NV Bar No. 13461)
	JONES LOVELOCK
11	6600 Amelia Earhart Court, Suite C
12	Las Vegas, Nevada 89119
12	Tel: (702) 805-8450 Fax: (702) 805-8451
13	nlovelock@joneslovelock.com
13	khyson@joneslovelock.com
14	<u>miyson(e)jonesio veioekteom</u>
	Counsel for Plaintiff wedi Corp.
15	
1.	HARTED OF A TEL
16	UNITED STATE
17	DICTDIC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

18	WEDI CORP.,	Case No. 2:22-cv-00457-CDS-BNW
19	Plaintiff,	STIPULATION TO EXTEND TIME TO
20	v.	RESPOND TO DEFENDANTS' MOTION FOR SANCTIONS PURSUANT TO
21	HYDROBLOK GRAND INTERNATIONAL LTD., HYDROBLOK GRAND	FRCP 11(c)(2) (First Request)
22	INTERNATIONAL INC., and HYDRO-BLOK USA LLC,	
23	,	
24	Defendants.	

Plaintiff wedi Corp. ("wedi") and Defendants Hydroblok Grand International Ltd. ("Hydroblok Grand Canada"), Hydroblok Grand International Inc. ("Hydroblok Grand Nevada"), and Hydro-Blok USA LLC ("Hydroblok USA") (collectively, "Defendants"), hereby stipulate as follows:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

- 1. The Complaint in this matter was filed March 14, 2022. Pursuant to a Stipulation by the parties filed May 13, 2022, and the Order entered May 16, 2022, Defendants' responses to the Complaint are due July 4, 2022.
- 2. On June 10, 2022, Defendants filed their Motion for Sanctions Pursuant to FRCP 11(c)(2) ("Motion for Sanctions"). Pursuant to LR 7-2(b), wedi's response to the Motion for Sanctions is due June 24, 2022, wedi requests an additional fourteen (14) days to respond to the Motion for Sanctions (July 8, 2022) and Defendants have agreed.
- 3. Pursuant to LR IA 6-1, the undersigned attorneys for wedi state that this is the first request for an extension of time to respond to the Motion for Sanctions and the extension is requested because of the severity of the allegations, the complexity of the issues, commitments in other litigation matters, and scheduling conflicts of wedi's attorneys.

DATED this 15th day of June, 2022.

DATED this 15th day of June, 2022.

By: /s/ Daniel J. Becka

By: /s/ John Denkenberger Daniel J. Becka, Esq.

Appearing Pro Hac Vice Law Offices of Daniel J. Becka 30 N. LaSalle Street, Suite 2727 Chicago, IL 60602

Justin C. Kanter, Esq. Appearing Pro Hac Vice Gaido & Fintzen 30 N. LaSalle Street, Suite 2727 Chicago, IL 60602

Nicole E. Lovelock, Esq. Kimberley A. Hyson, Esq. Andrea Champion, Esq. Jones Lovelock PLLC

6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119

Counsel for Plaintiff wed Corp

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: __June 30, 2022

John Denkenberger, Esq. Appearing Pro Hac Vice John Whitaker, Esq. Appearing Pro Hac Vice Christensen O'Connor Johnson Kindness 1201 Third Avenue, Suite 3600 Seattle, WA 98101

F. Christopher Austin, Esq. Weide & Miller, Ltd. 10655 Park Run Drive, Suite 100 Las Vegas, NV 89144

Counsel for Defendants